

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

GEORGE A. JACKSON, et al.,)	
)	
Plaintiffs,)	
)	
v.)	C. A. No. 05-823-SLR/LPS
)	
STANLEY TAYLOR, et al.,)	JURY TRIAL REQUESTED
)	
Defendants.)	

DEFENDANTS' MOTION FOR LEAVE TO DEPOSE PLAINTIFF

COME NOW Defendants Stanley Taylor, Joyce Talley, Tony Figario, Carl Anson, Michael Knight, Chris Senato, Joseph Atkins, Debbie Melvin, Richard Cockett, Richard Manuel, Wenston White, Steven Raynor, and Bethany Evans (collectively, "Defendants"), by and through their undersigned counsel, and respectfully move this Honorable Court to enter an Order granting Defendants' counsel the right to depose Plaintiff George A. Jackson ("Plaintiff Jackson"), an incarcerated individual:

1. Plaintiff Jackson is an inmate incarcerated at the Sussex Correctional Institution in Georgetown, Delaware.
2. Counsel for the Defendants wishes to depose Plaintiff Jackson as part of discovery in this case.
3. The discovery deadline in this matter is April 1, 2008.
4. Fed. R. Civ. P. 30(a)(2) requires leave of the Court to depose an incarcerated individual.
5. A form of order is attached to this Motion that grants Defendants' counsel the right to depose Plaintiff Jackson.

WHEREFORE, Defendants respectfully request that this Honorable Court grant their

Motion for Leave to Depose Plaintiff George A. Jackson.

**STATE OF DELAWARE
DEPARTMENT OF JUSTICE**

/s/ Catherine Damavandi
Catherine Damavandi (ID # 3823)
Deputy Attorney General
State of Delaware Department of Justice
820 N. French Street, 6th Floor
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(302) 577-8400
Attorney for State Defendants

DATE: February 26, 2008

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7.1.1 CERTIFICATE OF COUNSEL

Undersigned counsel hereby certify, pursuant to Local Rule 7.1.1, that:

1. Plaintiff George A. Jackson is currently incarcerated and it is not practical for undersigned counsel to communicate with him concerning Defendants' Motion for Leave to Depose Plaintiff.
2. Therefore, undersigned counsel assumes that the Motion is opposed.

**STATE OF DELAWARE
DEPARTMENT OF JUSTICE**

/s/ Catherine Damavandi
Catherine Damavandi (ID # 3823)
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State of Delaware Department of Justice
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CERTIFICATE OF SERVICE

I hereby certify that on February 26, 2008, I electronically filed *Defendants' Motion For Leave to Depose Plaintiff George A. Jackson* with the Clerk of Court using CM/ECF. I hereby certify that on February 26, 2008, I have mailed by United States Postal Service, the document to the non-registered parties on the attached list.

**STATE OF DELAWARE
DEPARTMENT OF JUSTICE**

/s/ Catherine Damavandi
Catherine Damavandi (ID # 3823)
Deputy Attorney General
State of Delaware
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List of Non-Registered Parties

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